

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE CEMENT MASONS)	
PENSION FUND, LOCAL 502;)	
TRUSTEES OF THE CEMENT MASONS)	
INSTITUTE OF CHICAGO, ILLINOIS;)	
TRUSTEES OF THE CEMENT MASONS)	
SAVINGS FUND, LOCAL 502; and)	
TRUSTEES OF THE CEMENT)	
MASONS APPRENTICE EDUCATION)	
AND TRAINING FUND, LOCAL 502,)	No. 17 C 8702
)	
Plaintiffs,)	Judge
)	
v.)	Magistrate Judge
)	
HOOKS AV, LLC, an Illinois Limited Liability)	
Company,)	
)	
Defendant.)	

COMPLAINT

Plaintiffs, by their attorneys, DONALD D. SCHWARTZ and ARNOLD AND KADJAN, LLP, complain against Defendant, **HOOKS AV, LLC**, as follows:

COUNT 1

1. (a) Jurisdiction of this cause is based on Section 301 of the National Labor Relations Act, 29 U.S.C. Section 185 (a) as amended.

(b) Jurisdiction of this cause is based upon Section 502 of the Employee Retirement Security Act of 1974, 29 U.S.C. Section 1132, 1145 (“ERISA”), as amended.

2. Venue is founded pursuant to 29 U.S.C. Section 1132 (e)(2) in this District where the Funds, as described in Paragraph 3, are administered.

3. (a) The Plaintiffs in this count are TRUSTEES OF THE CEMENT MASONS PENSION FUND, LOCAL 502; TRUSTEES OF THE CEMENT MASONS INSTITUTE OF